

ARGUMENTS/REMARKS

Claims 1-18 are pending. Claims 1, 6, 7, 8, 13, and 18 were amended. No new matter has been added. Claims 1, 2, 6-8, 10-14, and 18 were rejected under 35 U.S.C. § 102(b) as anticipated by Webb et al. (U.S. Patent Application No. 2002/0083342) (hereinafter “Webb”). Claims 3-5, 9, and 15-17 were rejected under 35 U.S.C. 103(a) as obvious over Webb in view of Seki (U.S. Patent Application No. 10/195406).

These rejections and the associated assertions of the Office Action are respectfully traversed. However, in order to expedite the prosecution of this application, all of the independent claims have been amended to more clearly distinguish the art relied upon. By way of example, claim 1 has been amended to recite:

receiving content from one or more devices on the home network using a content protocol, wherein the content or services includes one or more of photos, music, documents, videos, games, or video or image data from one or more Internet cameras;

(Emphasis added).

All other independent claims have been amended in a similar fashion. In one or more embodiments described in the present application, content may be received using a content protocol such as Microsoft WindowsTM SMB protocol, UPnP Content protocol, or any other suitable content protocol. The application as filed provides various examples, including the following:

In step 230, remote user 120 activates link 270 to desired content (in this example, baby pictures). In step 235, gateway 110 transmits a signal to network device 105, according to a content protocol, requesting the content selected by remote user 120. The content protocol could be, e.g., Microsoft WindowsTM SMB protocol, UPnP Content Protocol, or any other suitable protocol (standardized, open or proprietary).

The Content Protocol should be able to provide the following functionality. The content protocol may allow write capability from client to server. In this configuration, the “server” is network device PC 105 and the “client” is gateway 110. The content protocol must allow read capability of the server by the client. Third, the content protocol should also have a security mechanism to authenticate the client-to-server connection. The content protocol may display content from server on client as local client content, as though it was part of the client’s local file system.

Also, the content protocol must allow for file sharing of content between the server and the client.

(p. 15, l. 23-34; p. 16, l. 1-10).

There is no indication that Webb discloses receiving content using a content protocol for receiving content from one or more devices on a home network. Moreover, Webb teaches away from using a content protocol for such a purpose: each device on the network described in Webb needs to include a web server that utilizes HTTP to serve files that form Web pages to requesting Web clients. For example, paragraph [0043] of Webb specifies that:

Each of the devices connected to the private network 16 includes an on-board Web server that allows a user to perform various configuration, trouble-shooting, and/or administrative functions with respect to the device. Each Web server has a respective IP address that is valid only on the private network 16.

(Emphasis added.)

Webb defines a “Web server” in paragraph [0030]:

A Web server (also referred to as an HTTP server) is a computer program that utilizes HTTP to serve files that form Web pages to requesting Web clients.

Requiring each device in a home network to include a Web server would present problems for a user of a home network, as noted in the present application:

One possible way to allow the content to remain in the home, secure, and still allow Internet users to access it, would be for the consumer to host his own web server, e.g., on a personal computer (“PC”) in his or her home. However, this solution would have at least the following requirements: (1) a dedicated PC running web server software; (2) an Internet gateway that supports network address translation (“NAT”) and a firewall, and (3) the expertise to install and configure this equipment and servers.

All of these requirements are potentially problematic for a typical user. The last requirement is beyond the expertise of the vast majority of consumers.

(Specification at p. 1, l. 20-32; p. 2, l. 1-10).

The specification notes further:

It would be desirable to provide content sharing capabilities for a home network without requiring consumers to be the IT department for the home network, the system administrator for servers running on the PC(s) in the home network and the web page designer in charge of displaying the content in a orderly fashion.

(p. 3, l. 3-8).

Each of the devices in Webb's private network is required to include an on-board Web server that uses HTTP to serve files that form Web pages. As understood, the devices in Webb's private network would not exchange content according to a content protocol. Accordingly, Webb does not anticipate any of the pending independent claims. It is respectfully requested that the rejection of claims 1, 2, 6-8, 10-14, and 18 under 35 U.S.C. § 102(b) be withdrawn.

The dependent claims include all the features of the independent claims on which they are based and are therefore allowable over Webb in view of Seki. However, Seki--and the combination of Webb and Seki--are distinguishable on other grounds.

Seki also does not teach or suggest the feature of receiving one or more of photos, music, documents, videos, games, or video or image data from one or more Internet cameras using a content protocol, as recited in the independent claims. Instead, Seki discloses an invention that "relates to a remote control proxy method and apparatus for remotely controlling controlled apparatus on a home network from an external network," as described in paragraph [0002]. For example, in paragraph [0105] Seki discloses a "network system using a home-network apparatus control method." Thus, in the system disclosed in Seki, for example, a "control request," "commands," or "control contents" may be received (paragraphs [0109], [0110], [0137]).

However, there is no teaching or suggestion in Seki of receiving what would normally be considered "content" using a content protocol. The amended independent claims clarify this distinction yet further by reciting specific examples of receiving "photos, music, documents, videos, games, or video or image data from one or more Internet cameras using a content protocol."

Therefore, even if one of skill in the art would have been motivated to combine Webb and Seki (which has not been established and which Applicants do not admit), this combination would not disclose all elements of the pending claims. Accordingly, it is respectfully requested that all rejections of the pending claims be withdrawn.

CONCLUSION

Applicants believe that all pending claims are allowable and respectfully request a Notice of Allowance for this application from the Examiner. Should the Examiner believe that a telephone conference would expedite the prosecution of this application, the undersigned can be reached at the telephone number set out below.

The Commissioner is hereby authorized to charge any additional fees, including any extension fees, which may be required or credit any overpayment directly to the account of the undersigned, No. 50-4480 (Order No. CISC347).

Respectfully submitted,
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